

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Rhodie I. Bruce	:	Chapter 13
	:	No.: 19-16697-MDC
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY NATIONSTAR MORTGAGE, LLC..

Debtor, Rhodie I. Bruce, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Nationstar Mortgage, LLC., hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtor avers all payments have been made to date.
9. Denied. Debtor requests Movant's post-petition accounting and the debtor will provide proof of the same.
10. Debtor unsure of the same.
11. Debtor unsure of the same.
12. Denied as relevant as debtor avers all payments were made to date.
13. Denied.
14. Denied.

15. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: March 22, 2021

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

William C. Miller, Esq.
Chapter 13 Trustee

Charles G. Wohlrab
Electronic Notice
Attorney for Movant

Dated: March 22, 2021

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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